

# EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**MDL No. 2804**

**Case No. 17-md-2804**

**Judge Dan Aaron Polster**

**This document relates to:**

***The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.***

**Case No. 18-op-45090**

**DECLARATION OF ELIZABETH MANGON**

1. My name is Elizabeth Mangon. I am employed as the Department Director of Client Rights and Quality Improvement at Summit County Children Services (“SCCS”). I am over the age of 18 and competent to make this declaration. Unless stated otherwise, I have personal knowledge of the matters stated herein.

2. I understand that the County of Summit (“the County”), and through the County, Summit County Children Services, is a Plaintiff in the MDL proceeding referenced above. I also understand that Defendants in this matter have requested that SCCS produce twenty-five (25) case files of children who have interacted with SCCS and have mentions of opioid use in their files.

3. In my role at SCCS, I supervise those who routinely deal with children’s case files. I am also familiar with the Statewide Automated Child Welfare Information System (“SACWIS”).

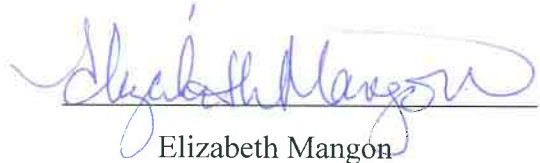
4. SCCS does not keep physical files containing personal information of the children that interact with the agency, nor do the files contain documentation of the casework relative

to the children. Such information is contained only in SACWIS. The physical files pertaining to children that SCCS does keep contain information from collateral sources that SCCS is not at liberty to re-disclose. The file may also contain physical correspondence, but would not include substantive information relative to the case. I have no knowledge of whether this is true for other counties in Ohio, but that is the practice of SCCS.

5. SCCS has consistently maintained that it is not authorized to release children's files due to the Ohio and federal confidentiality laws by which it is bound. I can attest that it is my understanding as well, and that if Defendants need the information found in SCCS case files, such information is more properly sought from SACWIS and the State of Ohio.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct to the best of my knowledge.

Executed on January 31, 2019



Elizabeth Mangon